

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major Draft Permit Renewal No. F-03-010

LEGGETT & PLATT – ADCOM WIRE COMPANY

NICHOLASVILLE, KENTUCKY

March 14, 2002

WILSON TAN, REVIEWER

Plant I.D. # 21-113-00012

Application Log # 53735

SOURCE DESCRIPTION:

Leggett & Platt – Adcom Wire Company, an existing conditional major source (for Particulate Matter) submitted a permit application to its existing O-91-057 permit.

Adcom Wire Company in Nicholasville, Kentucky produces steel wire that is distributed both intra-company for bedspring manufacture and external outside sales. Adcom Wire Company has requested a permit modification to allow for the eventual production of up to 250,000 tons/yr. of drawn wire.

COMMENTS:

Control Equipment:

Sulfuric Acid emissions is controlled by a scrubber with 99% control efficiency.

Applicable Regulations:

Applicable regulations for this permit modification are

- i) Regulation 401 KAR 59:010 -New process operations
- ii) Regulation 401 KAR 63:021 -Existing sources emitting toxic air pollutants.
- iii) Regulation 401 KAR 63:010 – Fugitive Emission.

Affected state: None.

EMISSION AND OPERATING CAPS DESCRIPTION:

- i) 12-month rolling average of Particulate Matter (PM) shall not exceed 95 tons/yr. (this includes sulfuric acid mist emissions), to preclude Major Source applicability.
- ii) Hourly particulate emission, as measured by Reference Method 5, Appendix A, 40 CFR 60, averaged over three hours shall not exceed 28.67 lbs/hr. [401 KAR 59:010, Section 3(2)]
- iii) Rod/wire usage shall not exceed 250,000 tons/yr.
- iv) Sulfuric acid makeup shall not exceed 3,099 tons/yr.
- v) Maximum quantity input of Pennzoil SM Process Oil N-60 shall not exceed 4,563 gals/yr.
- vi) VOC emission shall not exceed 16.75 tons/yr.
- vii) Source emissions of calcium hydroxide shall not exceed 5.97 lbs/hr.
- viii) Source emissions of sodium hydroxide shall not exceed 2.38 lbs/hr.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.